

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 2, 3.1, 3.2, 3.3, 4, 5.1, 5.2, INF/01

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON SPICES AND CULINARY HERBS

Seventh Session

Kochi, Kerala India

29 January – 2 February 2024

Comment of Bangladesh

Objectives

This document offers a review and analysis of the agenda items planned for discussion at the 7th session of the Codex Committee on Spices and Culinary Herbs, scheduled to take place physically in Kochi, Kerala (India) from 29 January 2024 – 2 February 2024.

The document is intended for possible use by the Codex communities of practice promoted by the Global Food Regulatory Science Society (GFoRSS) as part of their contribution to enhancing awareness and supporting effective participation in international standard setting meetings (Codex meetings) by representatives from members and observers.

The analysis provided in this document offers a factual review of key agenda items of CAC46, pertaining to:

- A. [Agenda Item 2: Matters referred by the Codex Alimentarius Commission and its Subsidiary Bodies](#)
- B. [Agenda Item 3.1: Draft standard for dried SMALL CARDAMOM](#)
- C. [Agenda Item 3.2: Draft standard for Spices in Dried Fruits and Berries: Part A - Requirements for Allspices, Juniper Berry, Star Anise](#)
- D. [Agenda Item 3.3: Draft standard for Spices in Dried Fruits and Berries: Part B - Requirements for Vanilla](#)
- E. [Agenda Item 4: Proposed draft standard for TURMERIC](#)
- F. [Agenda Item 5.1: Consideration of the proposals for NEW WORK \(replies to CL 2022/03 -SCH\)](#)
- G. [Agenda Item 5.11: Discussion Paper on the development of a standard for dried roots, rhizomes, bulbs – galangal; greater galangal; lesser galangal; horseradish root; onions and shallots](#)
- H. [Agenda Item 5.2: Update to the TEMPLATE for SCH standards](#)
- I. [Glossary of Terms for SCH Standards](#)

This document will offer an analysis of select key agenda items to support the development of positions at the national and regional level.

This analysis is indicative in nature and does not represent an official position of the organization, its membership or its management.

A. [Agenda Item 2: Matters referred by the Codex Alimentarius Commission and its Subsidiary Bodies](#)

Document Number: [CX/SCH 24/7/2 Rev.1](#)

Status in Codex Step Process: N/A

CCEXEC84 (2023)

- At CCFL's request, clarification was sought from CCSCH7 on the mandatory provision for country of harvest as there could potentially be repercussions on application of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) requiring discussion at CCFL48.

CCMAS42 (2023)

- Will inform relevant committees to review their sampling plants and comply with the revised General Guidelines on Sampling (CXG 50-2004).
- Agreed to return the methods proposed by CCSCCH for further consideration: Standards for dried or dehydrated ginger (CXS 343-2021), Cloves (CXS 344-2021), Basil (CXS 345-2021), Chilli Pepper and Paprika (CXS 353-2022), and Saffron, and the Draft Standard for spices derived from dried fruits and berries (Part A – allspice, juniper berry and star anise). And, requested CCSCCH respond to CCMAS questions (in Appendix) and also provide a glossary of terms to assist the committee in method endorsement.

CCFL47 (2023)

- Will endorse the Standard for Dried Floral Parts – Saffron labelling provisions excluding country of origin (8.3.1) and the country of harvest (8.3.2) which are referred back to CCSCCH for reconsideration and clarification, including why country of harvest is mandatory and how this benefits fraud prevention.

Key Considerations

- What is the distinction between country of origin and country of harvest? Given that the draft standard for dried saffron specifically states that it excludes industrial processing (Industrial processing may include steps that could change the nature as per the CCFL definition of origin), then this makes the distinction between country of origin and country of harvest become NOT NEEDED i.e., the mandatory declaration of the country of harvest declaration versus country origin would not have any benefit (country of origin = country of harvest)?
- Mandatory declaration of country of harvest in the dried saffron standard would introduce confusion and inconsistencies with existing Codex texts (both CCSCCH and CCFL).
- It is worth noting that CCSCCH has developed a glossary of terms (CX/SCH 17/3/10) for internal use.

B. Agenda Item 3.1: Draft standard for dried SMALL CARDAMOM

Document Number: [CX/ SCH 24/7/3](#)

Status in Codex Step Process: Step 6

Background:

CCSCCH6 (2022) agreed to forward the proposed draft standard for dried small cardamom to CAC45 for adoption at Step 5 and the provisions on labelling and methods of analysis to CCFL and CCMAS, respectively, for endorsement.

CAC45 adopted, at Step 5, the proposed draft standard for dried small cardamom forwarded by CCSCCH6 (2022). CCFA53 endorsed the food additive provision (with minor editorial revisions); labelling and methods of analysis provisions were submitted to CCFL and CCMAS, respectively, for endorsement.

The remaining issues to be discussed at CCSCCH7 (2024) are:

- Section 2.2 : Styles: Determination on
 - (i) Whole pod-unopened pods / capsules and/or partially opened with all seeds inside
 - (ii) Ground styles – separating the ground style resulting from grinding whole cardamom as defined in the “whole style” and grinding the seed only as indicated in the “Seed Style”
- Annex I – Table I Chemical Characteristics : Determine which values will be used for powdered capsules with seeds. Each of these values were left in square brackets.
- Annex I Table II: Physical Characteristics
 - Determine values for Whole, Dead Insects and Mammalian Excreta in Seeds.
 - Determine Other Excreta, Mould Visible- these values were also left in square brackets.
 - Determine values for Powdered seeds – most were also left in square brackets.

An EWG chaired by India and co-chaired by Guatemala and Iran was established to further consider the standard. General agreement was achieved on most provisions apart from the following:

- The values for Total ash on dry basis % w/w (max.) in seeds
- Acid insoluble ash on dry basis % w/w(max.)
- Moisture content % w/w (max.)
- Volatile oil on dry basis ml/100g(min.)
- Powdered Capsules with seeds

The draft standard has been further revised (Based on the comments received and after two rounds of consultations with the EWG members).

Some suggestions for the change in style are as follows:

Section 2.2 Styles.

Whole pods/capsules: - Clarification may be sought as to

- Whether open cardamom pods/capsules are negatively affected (seeds missing and lowering of moisture) by the atmosphere.
- Should an allowance be made for incidental opening of whole pods/capsules due to shipping and handling.

Ground/powdered cardamom: - it may be useful to define both types of ground cardamom as follows:

- Ground/powdered whole cardamom – resulting from grinding the product described in the 'Whole' style.
- Ground/powdered seeds: resulting from grinding seeds only.

Annex 1. Table 1. Chemical Characteristics

- It may be possible to support the Total Ash maximum of 9.5 and the Volatile Oil minimum of 3.

Annex 1. Table 2. Physical Characteristics

- It is noteworthy that the use of NA and **N/A** is confusing. N/A is assigned based on the footnote. Therefore, when a physical characteristic does not apply, a forward slash (N/A) should be used instead of NA.
- It may be important to add a Reference for foreign matter (0.5%) as well as a reference for the various seed values

Other Editorial corrections may be needed to resolve text inconsistencies and ensure consistent provisions across CCSCCH standards, for example minor edits to terms and capitalization used in the draft standard, it may be considered to suggest alignment of sections for consistency with the **Template for Spices and Culinary Herbs Standards** (CX/SCH 24/7/8) e.g., **3.2 Quality factors** to read: **3.2 Quality criteria**

Key Considerations

- Overall, it is suggested this standard be supported for advancement in the Codex Step process/adoption.

C. Agenda Item 3.2: Draft standard for Spices in Dried Fruits and Berries: Part A - Requirements for Allspices, Juniper Berry, Star Anise

Document Number: CX/ SCH 24/7/4

Status in Codex Step Process: Step 6

Background: An EWG, chaired by the USA and co-chaired by India, developed the draft standard for discussion at CCSCCH6 (2022). Vanilla was removed from the draft group standard. CAC45 (2022) adopted the standard (allspice, juniper berry, star anise) **at Step 5**. An EWG – led by USA, co-chaired by Madagascar, Mexico and India – to further advance the draft group standard.

After 2 rounds of consultations and minimal comments, the EWG recommended the draft standard be considered by CCSCCH7 plenary session with a view to recommend to CAC for final adoption.

In the first round, only two EWG members (Canada and Egypt) submitted comments on the outstanding provisions in square brackets in the document, Table 1, and Table 2. Several Issues were resolved from the 1st round.

There were no comments submitted to the second circulation.

All the provisions in **square brackets** were accepted indicated in bold and underline. However, there are a few bracketed values in Tables 1 and 2 that need to be discussed and agreed-upon.

Some Minor editorial comments may be raised in the relation with the capitalization of section headings and consistency in use of certain words (e.g. “practical” instead of “practicable”).

Key Considerations

- Support advancement in the Codex Step process.
- Ensure overall consistency of provisions in CCSCH standards.

D. Agenda Item 3.3: Draft standard for Spices in Dried Fruits and Berries: Part B - Requirements for Vanilla

Document Number: CX/ SCH 24/7/5

Status in Codex Step Process: Step 3

Due to vanilla's economic importance in global trade and its very distinct chemical / physical properties, at CCSCH6 it was removed from the group standard which included spices derived from dried fruits and berries (allspice, juniper berry, star anise and vanilla), despite objections from the US and other delegations, and returned for development by an EWG led by USA (co-chaired by Madagascar, Mexico and India) at Step 2/3 as a stand-alone standard. Several technical issues remained unresolved:

- **2.2 Style.** “split vanilla” clarification, as well as, how splitting affects moisture / vanillin content.
- **8.3.2 Country of harvest (optional)[mandatory].** This matter remained unresolved. CCFL45 advised (REP21/FL para 41) that the “General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) defined country of origin, while no definition was provided for country of harvest - which justified the decision of CCSCH5 on ‘country of harvest’ as an optional declaration”. CCFL47 also sought clear rationale from CCSCH on the identical provision for saffron regarding mandatory country of harvest declaration and benefits for fraud prevention. **It would be worth noting that there are no known methods that can be efficiently applied by Codex (and internationally) to determine country of harvest nor have any members supportive of mandatory declaration provided any validated methods.**
- **(i) Chemical Characteristics for Vanilla** (names of the individual chemical requirements and the numerical values) and (ii) each requirement per style and/or style per individual vanilla specie covered by the standard.

The EWG suggested CCSCH reconsider a table listing chemical characteristics by style where the highest and lowest moisture content values were indicated as a range. Consideration should be given to whether **a single value for** moisture content and vanillin content is acceptable. If not, meaning if the listing includes a range, the word as this would impact whether “maximum (max)” should be removed from the Moisture Content column. Note that moisture content requirement for vanilla seeds/caviar values range from not applicable (NA) to 35.0%.

Key Considerations :

Technical issues must be addressed before the draft standard can advance in Codex process: **CCSCH may want to adhere to the advice of the 45th and 47th Sessions of the Codex Committee on Food Labeling (CCFL45 & CCFL47) on this matter in the saffron standard (issues related to “Country of Harvest”):**

Country of Harvest as an optional provision in the draft standard for Vanilla: There is no definition of country of harvest, nor a clear distinction between country of harvest and country of origin – therefore and as a comprise for countries that insist to have such determination made in the standard, the determination of the Country of Harvest should be **an optional labelling declaration in the draft standard for vanilla.**

E. Agenda Item 4: Proposed draft standard for TURMERIC

Document Number: CX/ SCH 24/7/6

Status in Codex Step Process: Step 3

CCSCH5 (2021) – EWG chaired by Iran (co-chaired by India) developed standard for turmeric based on group standard concept (dried roots, rhizomes and bulbs).

Based on scientific documents, turmeric is identified as the common name – however EWG could not agree to section 8, i.e. making product name optional.

“Dead whole insects” were added to table 3 as well as a number of parameters with no consensus. Similarly, table 4 saw several parameters included requiring further consideration.

CCSCH7 to review draft standard.

There may be an interest to consider consistency of the standard with the American Spice Trade Association (ASTA) quality standards used for trade, as they have been applied for several decades as a reference by various producers and countries.

A proposal for Table 2 could be considered as follows:

Table2. Physical Characteristics for Dried or Dehydrated Turmeric

Product	Style	[Damage d Rhizome s % w/w (max)]	Mould Visible Insect defiled / infested % w/w (max)	Whole insects , dead (by count) /100 g (max)	Live insect s (By count) /100 g (max)	Extraneous matter1 %w/w (max)	Foreign matter 2 %w/w (max)	Mammalia n excreta % mg/kg (max)	Other Excreta3 % mg/kg, (max)
Turmeric	Whole	[5]	[0] 3	3 4	[0]	N/A 1.0 0.5	N/A 2	2 11 5 -	[2] 11 5
	Crushed/Cracked/Broken/ Pieces	[N/A] 2	N/A	3 4	[0]	N/A 1.0 0.5	N/A 0.5	2 11	11 [2]
	Powdered /Ground	[N/A]	N/A	N/A	[0]	N/A	N/A	N/A	N/A

Key Considerations

- Consistent use of terms in CCSCH standards.
- Overall Support for advancement in Codex Step process.

F. Agenda Item 5.1: Consideration of the proposals for NEW WORK (replies to CL 2022/03 -SCH)

Document Number: CX/SCH 24/7/7

Status in Codex Step Process: N/A

This phase initiates the development or revision of standards where member proposals are evaluated against the Codex Procedural Manual (in particular, Part 2. Critical Review on p.31). CCSCH forwards accepted proposals, accompanied by a project document, to CAC for approval.

CL 2023/01-SCH was circulated at the request of CCSCH6 in January 2023 with the deadline on 31 August 2023 seeking proposals for new work – 2 proposals were submitted:

- STANDARD FOR DRIED MARJORAM (submitted by Egypt)
- STANDARD FOR DRIED SEEDS- CORIANDER (submitted by India)

Key Considerations

- It may be useful to consider the inclusion of the draft standard for Coriander Seeds with other standards for dried seeds i.e. Nutmeg. (CAC45 (2022) reaffirmed its support for developing group standards as an efficient way to set CCSCH standards.)
- It may be worth discussing that there was an opportunity to include marjoram (*Oreganum majorana* L) in the oregano standard but CCSCH chose to go with a narrow definition of oregano. The condiment name "oregano" should be /may be understood to refer, not to any one species but to a particular spice flavor, furnished by plants of several genera in different parts of the world.

G. Agenda Item 5.11: Discussion Paper on the development of a standard for dried roots, rhizomes, bulbs – galangal; greater galangal; lesser galangal; horseradish root; onions and shallots

Document Number: [CX/SCH 24/7/7 Add.1](#)

Status in Codex Step Process: N/A

As agreed to by CCSC1 (2014) to develop group standards, which triage spices and herbs into groups based on the portion of the plant used, thus permitting focus on chemistry (taste/flavour) and physical characteristics / tolerances for defects (safety and quality). The US is proposing a standard for “Dried Roots, Rhizomes, Bulbs”. It is worth noting that other spices falling under this category are either completed (dried garlic, dried ginger) or presently under consideration (turmeric) by CCSC.

Key Considerations

- The availability of trade information for low volume high value products may present an issue.
- Data from exporting countries is important to ensure the development of a robust group standard.
- Support the development of group standards.

H. Agenda Item 5.2: Update to the TEMPLATE for SCH standards

Document Number: [CX/SCH 24/7/8](#)

Status in Codex Step Process: N/A

The group approach to standard development will allow CCSC to become more efficient, functional, and responsive to stakeholder needs by delivering standards a timely manner. CCSC3 (2017) – The US offered to prepare a discussion paper for the development of a group standard template based on Dried Fruits and Berries for discussion at CCSC4 (2019), further development and deliberation at CCSC5 (2021) where recommendations of the in-session working group (IWG) on Priorities Standard Layout and Group Standards were endorsed to update the Group standards template.

An EWG chaired by the US (assisted by Brazil, Ghana, India, Islamic Republic of Iran, UK) were charged to revise the template (SCH/5 INF/01) for consideration by CCSC6 (2022). It was noted that routine template updates are necessary to ensure it continuously met the technical needs of CCSC. CCSC7 will consider latest iteration of the Group standards template.

Key Considerations

- **The CCSC may wish to consider another template “minimum quality requirements” to facilitate trade in Spices and Culinary Herbs that do not have established chemical and physical requirements. There are reference values with the European Spice Association Specifications of Quality Minima for Herbs and Spices and the U. S. Food and Drug Administration Food Defect Action Levels.**
- Support continuous revision of group standard template to ensure efficient and consistent development of CCSC standards.

I. Glossary of Terms for SCH Standards

Document Number: [SCH/7 INF/01](#)

Status in Codex Step Process: N/A

CCSC2 (2015) agreed to develop a glossary of terms, amended as necessary, to help facilitate their use in standards for spices and culinary herbs and to facilitate SCH trade in – this document would not contravene the Procedural Manual regarding existing Codex definitions, in particular food additives and contaminants.

Key Considerations

Support use of the glossary to help ensure consistent use of terminology during standard development.